



SAN FRANCISCO  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
44 MONTGOMERY STREET, SUITE 2800  
SAN FRANCISCO, CA 94104

December 15, 2021

**FILED BY ECF**

The Hon. Lorna G. Schofield  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *SEC v. Qin, et al.*, 20-CV-10849(LGS): re Offer of Settlement

Dear Judge Schofield,

In accordance with the parties' discussion with the Court on November 20, 2021, and the Court's Order and Case Management Plan of the same date (ECF No. 106), counsel for the Plaintiff Securities and Exchange Commission writes to inform the Court that defendant Stefan Qin has provided to us a signed offer to settle this case, which we will recommend the Commission accept.

The offer requires, first, consideration and approval by the Commission, and second, consideration and approval by the Court. We anticipate that the first step may take 60 days; if obtaining the Commission's consideration proves to take longer, we will notify the Court by no later than February 15, 2022.

Respectfully submitted,

/s/ Susan F. LaMarca  
Susan F. LaMarca  
Counsel for Plaintiff Securities and  
Exchange Commission

Cc: Stefan Qin (via Sean Hecker, Esq., by email)